



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Jack L. Roberts, Treasurer  
Southern States Police Benevolent  
Assoc. PAC Fund  
1900 Brannan Road  
McDonough, GA 30253

Identification Number: C00265546

OCT 18 2000

Reference: Year End Report (7/1/99-12/31/99)

Dear Mr. Roberts:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a receipt(s) from an organization(s) that is not registered with the Commission. 2 U.S.C. §441b prohibits the receipt of funds from national banks, corporations, and labor organizations. Under 11 CFR §102.6, however, certain entities may serve as collecting agents for the purpose of transmitting contributions to a separate segregated fund. A collecting agent may be, but is not limited to, a committee which is affiliated with the separate segregated fund; the connected organization; or a local, national, or international union.

Funds received from a collecting agent are to be attributed to the original contributors and should be disclosed according to the requirements of 11 CFR §104.3(a). If the amounts in question were contributed by individuals and transmitted to your committee by a collecting agent, the activity should be included on Line 11(a)(i) of the Detailed Summary Page. Any contribution from an individual exceeding \$200 in the aggregate during the calendar year should be itemized on a supporting Schedule A. Collecting agents need not be identified on your report.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you

SOUTHERN STATES POLICE BENEVOLENT ASSOC. PAC FUND

have received funds from an entity which was not serving as a collecting agent, you must transfer-out the impermissible funds to an account not used to influence federal elections or refund the full amount to the donors in accordance with 11 CFR §103.3(b). In the best interest of your committee, all transfers-out and refunds should be made within thirty days of the treasurer's receipt of the impermissible funds. In order to protect the donor's interests, the Commission recommends that you inform the possible involuntary contributors in writing to provide the donors with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Please amend Schedule B supporting Line 23 by providing the office sought (i.e. House, Senate, President) including state and Congressional district, if possible, for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

-Schedule B supporting Line 23 discloses contributions to federal candidates for which no election designation has been provided. Please note that if no designation is included in your report, the contributions will be attributed to the next upcoming election for the recipient candidate. Thus, for future reporting purposes, it is in your committee's interest to designate the appropriate election in order to avoid the appearance of excessive contributions made to federal candidates by your committee.

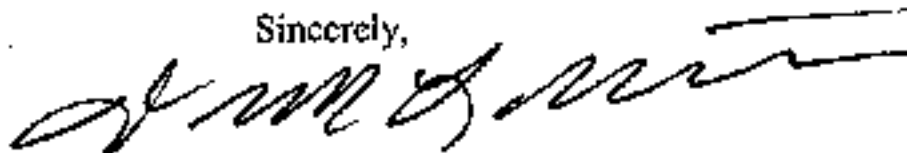
A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports

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Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in black ink, appearing to read "D. L. Averett", with a long horizontal flourish extending to the right.

Donald L. Averett  
Reports Analyst  
Reports Analysis Division

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## SCHEDULE A

## ITEMIZED RECEIPTS

Use separate schedule(s)  
for each category of the  
Detailed Summary PageFOR LINE NUMBER  
11A1

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

## NAME OF COMMITTEE (in Full)

SOUTHERN STATES POLICE BENEVOLENT ASSOC PAC FUND

<b>Full Name, Mailing Address, and ZIP Code</b> SOUTHERN STATES P.B.A., INC. 1800 BRANNAN ROAD MCDONOUGH GA 30253	<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> 07/09/1999 \$ .50 PER MEMBER PER MONTH	<b>Amount of Each Receipt this Period</b> 6062.15
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date</b> > \$ 6062.15		
<b>Full Name, Mailing Address, and ZIP Code</b> SOUTHERN STATES P.B.A., INC. 1800 BRANNAN ROAD MCDONOUGH GA 30253	<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> 10/15/1999 \$ .50 PER MEMBER PER MONTH	<b>Amount of Each Receipt this Period</b> 24420.50
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date</b> > \$ 30482.65		
<b>Full Name, Mailing Address, and ZIP Code</b> VINITA SULLARD 1440 GREEN STREET REMBERTON GA 31601	<b>Name of Employer</b>  <b>Occupation</b>	<b>Date (month, day, year)</b> 10/19/1999 IN-KIND CONTRIBUTION	<b>Amount of Each Receipt this Period</b> 19.05
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Aggregate Year-to-Date</b> > \$ 19.05		

SUBTOTALS of Receipts This Page (Optional)

TOTALS This Period (last page this line number only)

30501.70

